



The Reid Supply Company

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Kansas City, Mo. 64101
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Mr. David Wagoner
U.S.E.P.A. Region VII
324 E. 11th
Kansas City, Mo. 64106

April 13, 1984

Reply to Wichita office

Dear Mr. Wagoner:

The purpose of this letter is both to specify which parameters are to be used for the annual analysis and to simplify the fingerprinting procedures described in our response letter of March 28, 1984. The reason for specifying the parameters for the annual waste analysis is to conduct a reasonable detailed waste analysis for proper handling by measuring parameters that will be relevant to the wastestream without analyzing for unnecessary parameters for a given wastestream. This will allow the analysis to be tailored to the particular wastestream. The reason for simplifying the fingerprint analysis is to maintain reasonable control over variant wastestreams coming into Reid Supply (that do not correspond to the annual waste analysis) without causing any needless expense to the generator due to an extensive analysis.

THE ORIGINAL OR ANNUAL ANALYSIS

The basic annual analysis will measure for quantitative and qualitative solvent composition, BTU's per pound, pH, and compatibility with other organic solvents. Generators with wastestreams that are only flammable liquids will have this kind of an analysis. However, if a generator has a chlorinated hydrocarbon wastestream, then each of his wastestreams coming to Reid Supply Company will be tested annually for organic chlorides. If a wastestream is paint solids, then the heavy metals lead, barium, and chromium will be measured. If the generator handles PCB's in his operation, then PCB's will have to be measured since Reid Supply is not permitted to handle PCB's. Please refer to the enclosed waste analysis scheme, the Reid Supply Analysis Parameters and Rationale, and the Mid West Laboratory Test Methods for Parameters that replace the March 28 response letter information.

Special provision will be made for generators that have notably consistent wastestreams. If during the year significant varia-

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tions from the original detailed analysis appear in the fingerprint analysis with each shipment as listed below, the detailed analysis will be repeated. As long as the wastestream remains within the accepted variations listed below and if the generator does not notify Reid Supply of any significant wastestreams, the detailed annual analysis will not need to be repeated. However, the generator audit will be repeated annually regardless of past wastestream history.

FINGERPRINT ANALYSIS

This simplified fingerprint analysis plan will be used in conjunction with the Generator Audit form provided in the response letter and modified in this mailing. Rather than include PCB, Chloride, and BTU tests in the fingerprinting analysis, only solvent composition, pH, and blending compatibility will be performed on each wastestream regardless of the size. The fingerprint analysis will include a test for PCB's if the generator handles PCB's in his operation and the possibility of PCB contamination exists as indicated by the Generator Audit form or if PCB's appear on the initial or annual detailed waste analysis. Chloride and BTU levels will be monitored by the determination of solvent composition by gas chromatography. Since chlorinated solvents are the primary source of chlorides coming into Reid Supply, the gas chromatograph will show any unusual quantities of chlorides in the form of chlorinated solvent in a given wastestream that would not line up with the original or annual detailed analysis. Any significant variations in BTU level could also be determined by solvent composition variations.

As with the former fingerprint analysis program, when a significant variation from the original or annual detailed analysis occurs, the generator will be notified and further analysis performed on specific drums to insure proper handling of the wastestream. Significant variations that would warrant special analyses would be:

1. pH outside the range of 4-11
2. incompatible response when mixed with a sample of blended solvent
3. chlorinated solvent present or much higher in composition when compared with original or annual waste analysis
4. PCB's detected at levels over 50 ppm (this test only for special fingerprinting of wastestreams that probably contain PCB's)
5. an unusual peak in the gas chromatograph

Please refer to the enclosed diagram showing the fingerprint analysis scheme which will replace the two diagrams of the fingerprint procedures for wastestreams under ten drums and over nine.

This is a reasonable analysis program that provides information for safe and responsible handling of wastestreams and insures wastestream consistency between the annual waste analyses each time the wastestream comes into Reid Supply Company. It also has the advantage of simplifying the fingerprint procedure without losing significant monitoring capabilities of necessary parameters.

Please let me know if you have any questions.

Yours truly,

David N. Trombold

David Trombold
Hazardous Waste Coordinator

cps: John Goetz, KDHE

WASTE ANALYSIS SCHEME

ORIGINAL ANALYSIS, ANNUAL, OR SPECIAL ANALYSIS
DUE TO SIGNIFICANT VARIATION IN WASTESTREAM
(on representative composite sample of wastestream)

Parameters: solvent composition

pH
heavy metals (Ba, Cr, Pb)
compatibility with waste solvent mixture
organic chloride (if generator has a waste-
stream containing chlori-
nated hydrocarbons)
PCB's (if generator handles PCB's in his
operation)



EACH PICK UP

WASTE FOR DISTILLATION
(representative composite sample)

WASTE FOR BLENDING
(representative composite samples)

FINGERPRINT ANALYSIS

FINGERPRINT ANALYSIS

Parameters: solvent composition

Parameters: solvent composition

pH
compatibility with
waste solvent
mixture
PCB's (if generator
handles them in
his operation)

pH
compatibility with
waste solvent
mixture
PCB's (if generator
handles them in
his operation)

Fail

Pass

Fail

Pass

Special
Analysis

Storage
and
Processing

Special
Analysis

Storage
and
Processing

REID SUPPLY ANALYSIS
PARAMETERS AND RATIONALE

<u>Parameters</u>	<u>Rationale</u>
Solvent composition (qualitative and quantitative)	Handling safety, industrial hygiene, compatibility
BTU/pound	Prevent sham recycling for material going to Systech as fuel
pH (aqueous)	Drum and tank compatibility and reactivity with solvents
Organic chlorides	Systech is permitted only to receive a small percentage and chlorinated solvent waste is readily available at Reid Supply Company. It would be easy for Reid Supply to exceed the limit.
PCB's	Reid Supply is not permitted to handle above 50 ppm. For industrial hygiene at Reid Supply to prevent unexpected exposure
Compatibility with waste solvent mixture	Drum and tank compability, hazard to workers

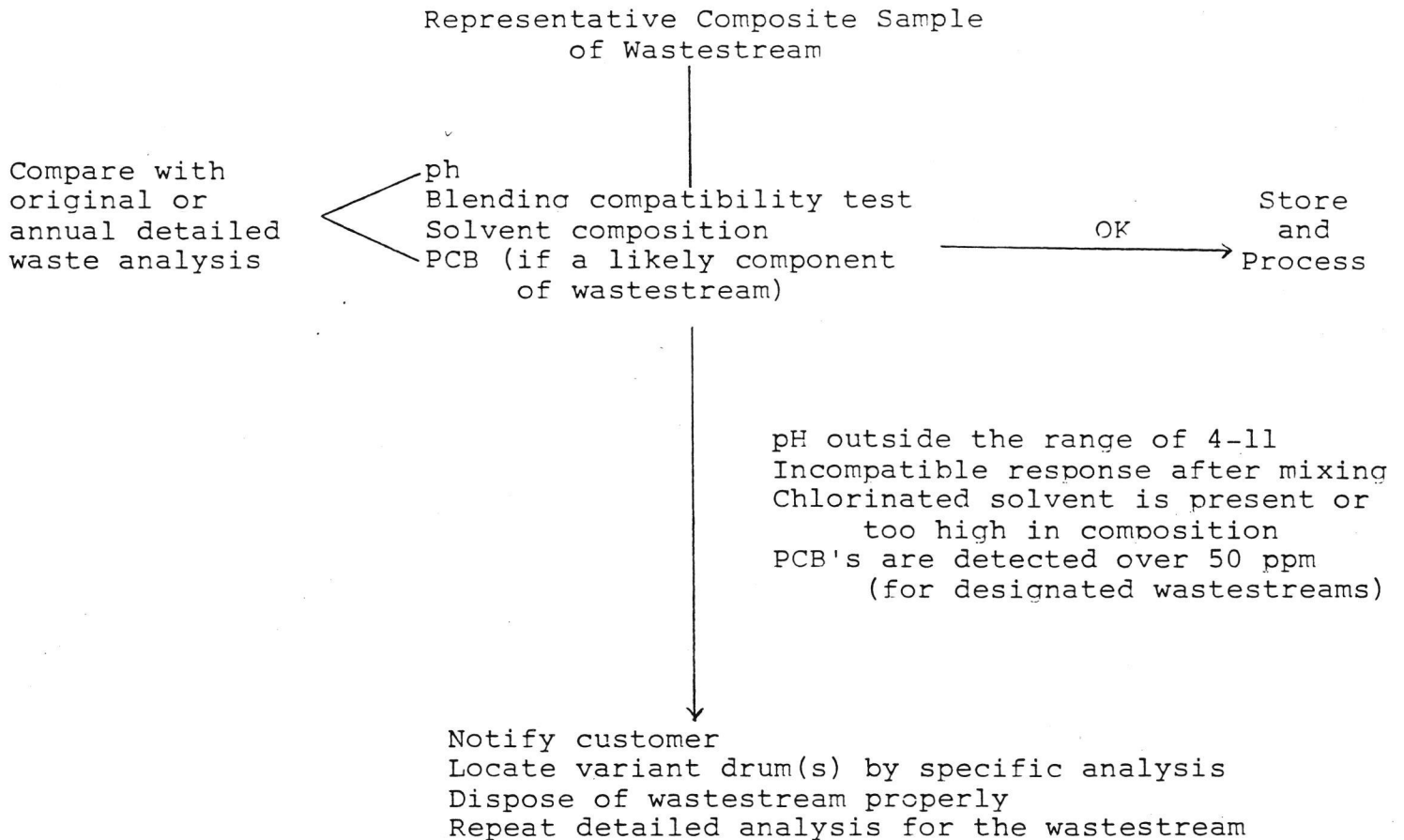
MID WEST LABORATORIES
TEST METHODS FOR PARAMETERS

<u>Parameters</u>	<u>Test Method</u>
Solvent composition (qualitative and quantitative) (% by volume)	Gas chromatography (FID)
BTU/pound	Bomb calorimeter
pH (aqueous)	EPA Method 9040 ¹ , electronic pH measurement of sample
Organic chlorides (% by weight)	UOP Method 395-79 ² , sodium biphenyl reduction and colorimetric finish or UOP Method 588-65, sodium biphenyl reduction and potentiometric titration
PCB's (ppm)	EPA Method 8080 ¹ , gas chromatographic analysis for organochlorine pesticide and PCB's in liquid and solid matrices

¹Test Methods for Evaluating Solid Waste SW-846 (1983).
Office of Solid Waste and Emergency Response, U.S.
Environmental Protection Agency, Washington, D.C. 20460.

²UOP Laboratory Test Methods for Petroleum and Its Products,
UOP Process Division, UOP, Inc.

FINGERPRINT PROCEDURE FOR INCOMING
WASTESTREAMS TO REID SUPPLY COMPANY



GENERATOR AUDIT
One form per wastestream

Date _____

Generator Name _____ EPA ID# _____

Address _____ City _____ State _____ Zip _____

Phone _____ Company Representative _____

DOT Shipping Name _____ Hazard Class _____

ID# _____ EPA Hazardous Waste # _____

SPECIFIC WASTESTREAM INFORMATION

Waste Name _____

Known components _____

Process generating waste _____

Types and quantities of raw materials, catalysts, and reagents used in process _____

Possible alternatives resulting in use of other hazardous or non-hazardous materials which could cause wastestream variation _____

Routine variations in process operation _____

Average rate of production _____

Any variation in the rate of production _____

Time of storage onsite before shipment _____

Controlled or uncontrolled changes to waste during storage (including water) _____

Any waste analysis data for wastestream (Any analysis form) _____

Approximate amount of settled solids in drums _____

Relative viscosity _____

General ranking of wastestream's ignitability or reactivity _____

Previous history of waste handling and any remarkable incidents' _____

GENERAL WASTESTREAM INFORMATION

Other sources of waste which could be intentionally or accidentally mixed with the wastestream _____

Any waste containing radioactivity _____

Any waste containing PCB's _____

Procedures for managing other wastes on site _____

Practices used to avoid cross-contamination _____

Specific wastes that are incompatible with this waste stream _____

_____ Any present onsite _____

Provide representative sample (Consult Reid Supply for procedure)

Customer sampled _____ Salesman sampled _____

Analysis provided by _____

Is the generator willing to notify Reid Supply of any significant variations in the wastestream? _____

Salesman collecting information _____ Date _____

I certify that the above information is correct to the best of my knowledge and I realize that if there is a significant variation between the information provided both in the detailed analysis and in the questionnaire and the wastestream received by Reid Supply Company special costs to my company and procedures may be necessary for proper handling of the waste.

Company representative _____ Date _____

Cps:
Process Engineer
Customer
Salesman
File